

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>RUTHAMAE BROWN,</b>	:	<b>No. 02-CV-2660</b>
	:	
<b>Plaintiff,</b>	:	
	:	
	:	
<b>v.</b>	:	
	:	
<b>EQUICREDIT CORPORATION,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION OF PLAINTIFF RUTHAMAE BROWN AND  
DEFENDANT EQUICREDIT CORPORATION FOR EXTENSION OF TIME**

Plaintiff Ruthamae Brown ("Plaintiff") and Defendant EquiCredit Corporation ("EquiCredit", together with Plaintiff, the "Parties") hereby respectfully move this court for an extension of time in the above-captioned case within which Plaintiff may conduct further discovery. The Parties aver as follows in support of their request:

1. Trial is scheduled to begin on December 2, 2002.
2. Plaintiff has represented to counsel for EquiCredit that Plaintiff intends to Petition this Court for Leave to Amend the Complaint to add Sunrise Appraisals, Inc. and Capital Assurance Group as additional defendants ("Additional Defendants") and to extend discovery.
3. EquiCredit does not oppose Plaintiff's request.
4. The Parties agree that it is necessary to postpone the trial to effectuate discovery relative to the Additional Defendants.

5. Additionally, it is conceivable that the trial date as scheduled may conflict with another trial on EquiCredit's counsel's calendar, should this trial run more than one day.

WHEREFORE, for the foregoing reasons, Plaintiff Ruthamae Brown and Defendant EquiCredit Corporation of America respectfully request that the Court extend the trial date in this case until after determination of Plaintiff's Petition for Leave to Amend the Complaint.

Respectfully submitted,

**REED SMITH LLP**

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Counsel for Defendant  
EquiCredit Corporation

**MEROVITZ & CEDAR**

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David Cedar  
1234 Market Street, Suite 2040  
Philadelphia, PA 19107-3789

Counsel for Plaintiff Ruthamae Brown

Dated: November 22, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of November, 2002, a true and correct copy of the Joint Motion of Plaintiff Ruthamae Brown and Defendant EquiCredit Corporation for Extension of Time was served by U.S. first class mail upon the following counsel of record:

David M. Cedar, Esquire  
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Philadelphia, PA 19107-3789

(Co-Counsel for Plaintiff)

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Barbara Kiely

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<b>Plaintiff,</b>	:	
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	:	
<b>EQUICREDIT CORPORATION,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

**ORDER**

Upon consideration of the Joint Motion of Plaintiff Ruthamae Brown and defendant EquiCredit Corporation for Extension of Time, it is hereby ORDERED that said Motion is GRANTED and the trial date in this case is extended until after this Court rules on Plaintiff's Petition for Leave to Amend the Complaint.

BY THE COURT:

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J.